

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of)
)
The Establishment of Policies) IB Docket No. 99-81
and Service Rules for the Mobile) RM-9328
Satellite Service in the 2 GHz Band)

RECEIVED
JUN 24 1999
FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

To: The Commission

COMMENTS OF CENTURY OCN PROGRAMMING, INC.

The following Comments are submitted on behalf of Century OCN Programming, Inc. ("Orange County News Channel" or "OCN") in response to the Commission's *Notice of Proposed Rulemaking* in the captioned matter. The Orange County News Channel has a vital interest in this proceeding insofar as it may involve additional sharing of the 6425-6575 MHz spectrum for feeder links for service providers in the Mobile Satellite Service ("MSS"). OCN produces regional news for delivery to multichannel program distributors in Orange County, California and vicinity. The Company operates a number of microwave facilities in this frequency band for news gathering, coverage of live events, and program distribution.

These facilities and services could be severely impacted by the proposed sharing with MSS service providers. The proposal by Inmarsat Horizons for feeder uplinks in this band will make existing frequency coordination and interference problems even more acute. These


frequency bands are already shared with a number of other users and additional sharing will make it virtually impossible to rely on OCN's existing microwave operations and temporary video pick-ups for news gathering and distribution purposes. Coverage of breaking news events does not leave excess time for additional frequency coordination, particularly in areas of complex and heavy frequency usage such as Southern California.

The news programming and live coverage of breaking news events is of critical importance to residents in this area. These existing microwave facilities enable OCN to provide an important public service which should be allowed to continue without the risk of additional interference from feeder uplinks for MSS service providers. Accordingly, the public interest requires that the Commission delete the 6425-6575 MHz band from the frequencies that would be made available for MSS service.

Respectfully submitted,

CENTURY OCN PROGRAMMING, INC.

By


Robert L. James
COLE, RAYWID & BRAVERMAN, L.L.P.
Suite 200
1919 Pennsylvania Avenue, NW
Washington, DC 20006
202/659-9750

June 24, 1999